

INTERNET ARCHIVE
Wayback Machine

http://www.solitarytrees.net/cooper/aff_pc85.htm

Go

SEP OCT DEC

21

2006 2007 2010

Close X

Help ?

2 captures

21 Oct 07 - 20 Dec 10

Affidavit of Paulette Cooper

The following is the full text of the sworn affidavit by Paulette Cooper filed today in U.S. District Court in Los Angeles as part of a libel suit brought against Boston lawyer Michael Flynn by the Church of Scientology of California. After a long period of harassment, Paulette Cooper settled with the Church of Scientology in 1985. Under the terms of the settlement she is not permitted to discuss this affidavit.

(State of New York, County of New York)

Paulette Cooper, being first duly sworn according to law, deposes and says:

— I am Paulette Cooper, a resident of the City of New York, State of New York.

— I have a long history of conflict with the Church of Scientology, and I have been involved in substantial litigation against the church between 1971 and earlier this year. All litigation between the church and me has been settled and terminated.

— In 1978, one such lawsuit commenced between me and the Church of Scientology in the United States District Court for the Central District of California sitting in Los Angeles, Church of Scientology of California Inc. v. Paulette Cooper, Case No. 78-2053-RMT. While the church claimed that I had breached a prior settlement agreement with it, the principle focus of the lawsuit soon became my counterclaim for personal injuries against the church. I was represented in that case by Attorney John McNicholas. During the year 1980, Boston Attorney Michael J. Flynn convinced me that he should file on my behalf a lawsuit in Boston, Mass., against Scientology, alleging some of the matters that were the subject of my lawsuit pending in Los Angeles. I retained Attorney Flynn to file such a lawsuit in my behalf in the United States District Court for the District of Massachusetts, captioned Paulette Cooper v. Church of Scientology of Boston, et al., Civil Action No. 81-681-MC.

— I allowed Mr. Flynn to file the Boston case, and replaced my counsel in Los Angeles with an attorney selected by Mr. Flynn, because Mr. Flynn explained to me that he had devised a strategy for quickly and easily winning my litigation against Scientology and collecting money on a judgment. He explained that his whole strategy was based upon conducting an attack against Scientology founder L. Ron Hubbard by naming Mr. Hubbard as a defendant in my lawsuits. Mr. Flynn said that he believed that Mr. Hubbard would never appear in any of the lawsuits in which he was named, for any one of a number of possible reasons. Mr. Flynn told me that it was his belief that by approximately 1979, Mr. Hubbard had severed his ties with the church. The litigation, said Mr. Flynn, would be quickly terminated, either by obtaining a default judgment against Mr. Hubbard, or by having the Church of Scientology settle the litigation in order to protect Mr. Hubbard.

— In pursuit of this strategy of winning by seeking default judgments, my attorney filed in my lawsuits sworn statements alleging that Mr. Hubbard was in control of Scientology's activities, and that he directed a campaign against me. However, I never had any real evidence or reason (other than the word of my lawyers) to believe that Mr. Hubbard was in control of the activities of the Church of Scientology, and my attorneys never presented me with any evidence that such was the case. It is clear to me, on the basis of my conversation with Mr. Flynn on this subject, that the allegations concerning Mr. Hubbard's control over day-to-day Scientology activities had no basis in fact, but were being made solely for strategic reasons in pursuit of a default judgment.

Paulette Cooper

Sworn to before me this 4th day of March, 1985.

Paulette Cooper

- [Timeline 1969–1986](#)
- [The Scandal of Scientology](#)
- [The Bomb Threats](#)
- [Operation Freakout](#)
- [Cooper's Diary](#)
- [Clearwater Commission Testimony](#)

Alda N. Boyrie, Notary Public

